



SAN LUIS OBISPO COUNTY
DEPARTMENT OF PUBLIC WORKS

Paavo Ogren, Director

County Government Center, Room 207 • San Luis Obispo CA 93408 • (805) 781-5252

Fax (805) 781-1229

email address: pwd@co.slo.ca.us

October 16, 2013

Attn: Mr. Ted Daum, Project Manager
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Subject: Proposition 84 Draft Addendum to IRWM Program Guidelines – Appendix H: IRWM Plan Review Process

Dear Mr. Daum:

On behalf of the San Luis Obispo County Integrated Regional Water Management (IRWM) Regional Water Management Group (RWMG) and the San Luis Obispo County Flood Control and Water Conservation District, we offer comments and alternative approaches to the Draft "Addendum to the 2012 IRWM Guidelines – Draft August 2013 Appendix H: Plan Review Process" (Draft Addendum). Please consider implementing revisions suggested herein before finalizing the Draft Addendum. Both the San Luis Obispo County RWMG and one of its key stakeholder groups (comprised of over 30 members representing the full spectrum of water resources interests), the San Luis Obispo County Flood Control and Water Conservation District Water Resources Advisory Committee, voted unanimously to support the following comments at their October 2nd public meetings.

Our Region is committed to further developing and implementing our local IRWM Plan and Program to address our highest priority resources challenges. Additionally, we understand your Department is tasked with assessing *"whether the IRWM Plans are consistent with the IRWM Planning Act and the related IRWM Plan Standards contained in the 2012 IRWM Program Guidelines"* and providing *"a standardized means to review IRWM Plans for consistency."* We believe the following revisions to the Draft Addendum would better support both efforts.

Alternative Approaches:

We propose the following alternative approaches to improve efficiency of and expedite your Department's technical review of regions' IRWM Plans, while still empowering local stakeholders to manage and assess their local IRWM Programs. Proposed alternatives are:

- Alternative A – RWMG Self-Assessment with DWR Technical Review. Have RWMGs complete the Exhibit H-1 "2012 IRWM Plan Standards Review Tool Form" provided in the Draft Addendum, indicating whether the region's IRWM Plan addresses Guideline requirements (and on what page(s)), followed by a brief verification by DWR Staff; and/or

- Alternative B - Streamlining Technical Review. Assign DWR Staff to regions so review can be conducted during the public comment period associated with IRWM Plan development just prior to adoption.

Comments on Review Duration and Required Response:

Under Draft Addendum "Section III. When to Submit," please shorten the IRWM Plan submittal deadline from six (6) months to three (3) months prior to grant application deadlines. This still allows DWR Staff adequate time to conduct its estimated two (2) month technical review, while not taking away critical time for regions to ensure plans are robust and publicly vetted.

Under Draft Addendum "Section VIII. DWR Response" (sub-header "If Revisions are Necessary"), please allow RWMGs to make corrections up until the Round 3 Implementation Grant draft funding recommendations are made. This still provides your Department the opportunity to deem regions ineligible for grant funding if plans do not adequately address the Guidelines, but provides sufficient time for regions to follow a public stakeholder process to make the necessary revisions.

We welcome the opportunity to work with your staff to further develop these alternative approaches for IRWM Plan review. Thank you for considering this comment letter when finalizing the Draft Addendum. Should you have follow up questions or want further input, please contact Carolyn Berg, County Public Works Staff Engineer, at (805) 781- 5536.

Sincerely,



PAAVO A. OGREN

San Luis Obispo County Public Works Director

Attachments: Other Local Comment Letters

- c: Tracie Billington, Department of Water Resources, Chief of Financial Assistance Branch
Joe Yun, Department of Water Resources, IRWM Program Manager
Dean Benedix, San Luis Obispo County Public Works Department, Utilities Division Manager

File: ✓ CF 900.50.01 State Department of Water Resources
CF 900.46.01 IRWM Plan – Prop 84 – SLO Co Region

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P.S. WE REALLY APPRECIATE ALL OF THE
HELP & WORK OF MONICA REIS AND
KEITH WAMALE ON OUR BEHALF.

Signatories to the San Luis Obispo County Region Memorandum of Understanding as of October 18, 2013

Agency or Organization
San Luis Obispo County
San Luis Obispo County Flood Control and Water Conservation District
California Men's Colony
Central Coast Salmon Enhancement
City of Arroyo Grande
City of Grover Beach
City of Morro Bay
City of Paso Robles
City of Pismo Beach
City of San Luis Obispo
Coastal San Luis Resource Conservation District
Heritage Ranch Community Services District
Land Conservancy
Los Osos Community Services District
Morro Bay National Estuary Program
Nacimiento Regional Water Management Advisory Committee
Nipomo Community Services District
Oceano Community Services District
Templeton Community Services District
San Miguel Community Services District
San Simeon Community Services District
S&T Mutual Water Company
Upper Salinas - Las Tablas Resource Conservation District